REMARKS/ARGUMENTS

Claims 1-22 remain in the application, all of which stand rejected.

1. Rejection of Claims 1-22 Under 35 USC 102(e)

Claims 1-22 stand rejected under 35 USC 102(e) as being anticipated by Bennett et al. (U.S. Pat. No. 6,799,211 B1; hereinafter "Bennett").

Regarding claim 1, the Examiner asserts, in part, that:

> . . .Bennett discloses. . .
>   determining whether a device interface for each of said plurality of devices conforms with a standard interface [Bennett, Interpretation/extraction module, col 4 lines 40-65];
>   translating said device interface to conform with said standard interface when said device interface is nonconforming [Bennett, convert non-standard data into standard interface module, col 5 lines 7-28, Fig 1-2];

6/17/2005 Office Action, sec. 4, p. 2.

Applicant respectfully disagrees. The portions of Bennett that the Examiner relies on in making the above assertion state:

> Interpretation/extraction module 110 takes as inputs the non-standard data received from the communications modules 108 that attach to it. Interpretation/extraction module 110 can parse such non-standard data or particular data that may be used for network management purposes (e.g., management data). Additionally, interpretation/extraction module 110 may incorporate business and/or system rules, filters, correlation logic, rate logic, persist logic, etc. which can be applied to data received from communication modules 108. For example, interpretation/extraction module 110 may be configured with logic to examine and parse non-standard data for particular strings of text/data and to extract the same when found.
>   Interpretation/extraction module performs a useful function to filter out unnecessary data from source systems 102 from which network management data (in non-standard form) originates and which passes through communication modules 108. Hence interpretation/extraction module 110 can

reduce traffic and improve system performance of network management systems. It is important to note however, that a common communication agent provided in accordance with the present invention does not require the implementation of such rules and filters, and an organization implementing a common communications agent in accordance with the present invention may choose not to implement parsers, rules functions, etc.

Bennett, col. 4, lines 40-65.

After management data has been extracted from the source data received via communication modules 108, such management data may then be passed on to standard interface module 112. The standard interface module 112 is the module where non-standard data is converted into standardized data and ultimately passed to a network management/monitoring system. Like other modules within a common communication agent provided in accordance with the present invention, there can be multiple instances of a standard interface module 112, whereby each such module may receive data from different interpretation/rules modules 110. Standard interface module 112 takes the data generated and transmitted from the interpretations/ extraction module 110 and converts such data into standardized data having a standard format such as one provided in accordance with SNMP (Simple Network Management Protocol), CMIP, IDL (Interface Definition Language such as COBRA), etc. A standard interface module provided in accordance with the present invention is flexible enough to convert data from the interpretation/extraction module 110 into a format that may be defined by the organization implementing the present invention.

Bennett, col. 5, lines 7-28.

Bennett's above disclosure talks about "interpretation", "extraction" and "conversion" of *data*. Applicant therefore believes the above disclosure is directed toward the final element of Applicant's claim 1, which recites, "managing said number of devices according to said standard interface." However, the first two elements of Applicant's claim 1 are not directed to device management, but are rather directed to the setup of a system for managing devices. As such, these first two elements are largely interface-driven (i.e., it is determined whether device interfaces are conforming and, if not, *device interfaces* are translated - no data needs to be flowing as these system setup steps are performed).

In the end, Bennett's system enables management of network devices 102 via a standard interface 112, which does bear some similarly to the last element of

Applicant's claim 1. However, Bennett is largely silent on how the communication modules 108, interpolation/extraction module 110 and standard interface module 112 (i.e., those modules that are used for device management) are initially setup and configured. In fact, to a large degree, one can only speculate on how Bennett's modules 108, 110 and 112 are setup and configured. It appears to Applicant, however, that Bennett does not "determin[e] whether a device interface for each of said number of devices conforms with a standard interface" and then "translat[e] said device interface to conform with said standard interface when said device interface is nonconforming". Rather, it seems that Bennett's system does not care which device interface a particular piece of data comes from. Bennett then generates the standard data 114 by *parsing* non-standard *data* for recognizable strings and/or the like. For example, in the above excerpts from Bennett, Bennett indicates that, "interpretation/extraction module 110 may be configured with logic to examine and parse non-standard data for particular strings of text/data and to extract the same when found." This method is very much data-driven, and does not appear to contemplate a previous setup or configuration of particular translators for particular device interfaces. On the other hand, Applicant's claim 1 first determines "whether a device interface for each of said number of devices conforms with a standard interface", and then translates "said device interface to conform with said standard interface when said device interface is nonconforming". Thus, it is not "data" that is being translated in the first two elements of Applicant's claim 1, but rather "interfaces".

Although the method of Applicant's claim 1 might be useful in Bennett's system, Bennett does not suggest this. In fact, and as previously noted, Bennett provides few (if any) details on how the systems shown in its FIGS. 1 & 2 are setup and configured. Applicant's claim 1 is therefore believed to be allowable over Bennett's teachings.

Applicant's claims 9 and 19 are believed to be allowable at least for reasons similar to why claim 1 is believed to be allowable. Applicant's claims 2-8, 19-18 and 20-22 are believed to be allowable at least for the reason that each of these claims depends from one of claims 1, 9 or 19.

2. Conclusion

Given the above Remarks, Applicant respectfully requests the timely issuance of a Notice of Allowance.

Respectfully submitted,
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